

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

X CORP.,)	
)	
<i>Plaintiff,</i>)	
v.)	Case No. 7:24-cv-00114-O
)	
WORLD FEDERATION OF)	
ADVERTISERS;)	
UNILEVER PLC;)	
UNILEVER UNITED STATES, INC.;)	
MARS, INCORPORATED;)	
CVS HEALTH CORPORATION; and)	
ØRSTED A/S,)	
)	
<i>Defendants.</i>)	
)	

MOTION TO PROCEED WITHOUT LOCAL COUNSEL

Plaintiff seeks leave of the Court to proceed without local counsel and good cause exists for this request. The undersigned counsel resides in and maintains his principal office in this District but does not live within 50 miles of the Wichita Falls Division courthouse. Counsel previously lived in Wichita Falls, however, and is familiar with the city and traveling there from the Dallas area. Counsel is also able to attend any hearing scheduled by the Court and would be present even if local counsel were required. Moreover, due to the sensitive nature of the case, Plaintiff respectfully asks that the Court not require it to find additional counsel.

CONCLUSION

For the foregoing reasons, Plaintiff requests that the Court grant the motion to proceed without local counsel.

August 6, 2024

Respectfully submitted.

/s/ John C. Sullivan
John C. Sullivan
Texas Bar No. 24083920
john.sullivan@the-sl-lawfirm.com
Jace R. Yarbrough
Texas Bar No. 24110560
jace.yarbrough@the-sl-lawfirm.com
S|L LAW PLLC
610 Uptown Blvd., Suite 2000
Cedar Hill, TX 75104
Phone: (469) 523-1351
Facsimile: (469) 613-0891

DHILLON LAW GROUP, INC.
Christopher G. Renner*
DC Bar No. 1025699
cgrenner@dhillonlaw.com
(571) 430-2240 (voice and fax)
Jonathan M. Shaw*
Virginia Bar No. 98497
jshaw@dhillonlaw.com
(703) 748-2266 (voice and fax)
Andrew K. Mann*
Virginia Bar No. 77021
akmann@dhillonlaw.com
(571) 695-2677 (voice and fax)
2121 Eisenhower Avenue, Suite 608
Alexandria, VA 22314

Harmeet K. Dhillon*
California Bar No. 207873
harmeet@dhillonlaw.com
(415) 433-1700 (voice and fax)
177 Post Street, Suite 700
San Francisco, CA 94108

**pro hac vice motion pending*

Attorneys for Plaintiff X Corp.

CERTIFICATE OF SERVICE

I hereby certify that copies of this document are being served on each Defendant along with the Summons and Complaint in this action. Additionally, this document is being filed on August 6, 2024, via ECF.

/s/ John C. Sullivan
John C. Sullivan

CERTIFICATE OF CONFERENCE

As required by Local Civil Rule 7.1, I confirm that no conference was held on this motion because it was not possible to confer with opposing counsel given that counsel for Defendants has not yet been identified.

/s/ John C. Sullivan
John C. Sullivan